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*Attorneys for Defendants State of Nevada ex rel.
 Nevada Department of Corrections and Charles Daniels*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DAWNYELL FLYNN, an individual,
 Plaintiff,

v.

STATE OF NEVADA ex rel. NEVADA
 DEPARTMENT OF CORRECTIONS, a
 public entity of the State of Nevada;
 DONALD BURSE, an individual; CHARLES
 DANIELS, director, in his official capacity;
 and Doe Nevada Department of Corrections
 Employees 1-10, in their individual and
 official capacities,

Defendants.

Case No. 2:22-cv-01753

**STIPULATION AND ORDER TO
 EXTEND DEADLINE TO REPLY TO
 PLAINTIFF'S RESPONSE TO
 DEFENDANTS' MOTION TO
 DISMISS
 (First Request)**

Defendants, Nevada Department of Corrections (NDOC) and Charles Daniels, by
 and through counsel, Aaron D. Ford, Nevada Attorney General, and Chris Davis, Deputy
 Attorney General, of the State of Nevada, and Plaintiff Dawnyell Flynn, by through
 counsel, Christopher Peterson, Esq, of the American Civil Liberties Union of Nevada,

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1 pursuant to Local Rules IA 6-1, 6-2, and 7-1, hereby stipulate and agree to extend the time
2 for Defendants NDOC and Daniels to file their reply in support of their motion to dismiss
3 by fourteen days, from April 3, 2023, to **Monday, April 17, 2023**.

4 Plaintiffs and Defendants been in communication about potential settlement, which
5 discussions have been ongoing. The extension would allow the parties to continue to focus
6 on settlement. Moreover, while counsel for defendants has diligently attempted to timely
7 complete the reply in the short time provided by the rules, counsel has been unable to do
8 so because of his substantially increased caseload as a result of the departure of two other
9 deputy attorney generals. Finally, Defendants twice previously agreed to extend the time
10 for Plaintiff to respond to Defendants motion to dismiss, and therefore this short delay
11 should not prejudice either party, is made in good faith, and not for the purposes of delay.

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1 Accordingly, based on the foregoing and for good cause appearing, the parties, by
2 and through their respective counsel of record, do hereby stipulate and agree that to extend
3 the dispositive motion deadline by fourteen (14) days, and Defendant's reply in support of
4 their motion to dismiss shall be due on or before Monday, April 17, 2023.

5 Dated this 3rd day of April 2023.

6 **OFFICE OF THE NEVADA**
7 **ATTORNEY GENERAL**

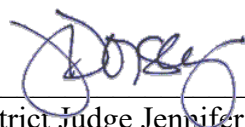
AMERICAN CIVIL LIBERTIES
UNION OF NEVADA

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9 By: /s/Chris Davis
10 CHRIS DAVIS (Bar No. 6616)
11 Senior Deputy Attorney General
Attorneys for Defendants NDOC
and Charles Daniels

By: /s/ Christopher Peterson
CHRISTOPHER PETERSON (Bar No. 13932)
Attorneys for Plaintiff

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13 **ORDER**

14 **IT IS SO ORDERED.**

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17 U.S. District Judge Jennifer A. Dorsey
Dated: April 4, 2023